EXHIBIT G.1

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

THE BAUER PLAINTIFFS' FIRST SET OF INTERROGATORIES (Interrogatory No. 1)

Pursuant to Rule 33 of the Federal Rules of Civil Procedure and the Local Rules of this Court, Plaintiffs Dr. Alan J. Bauer, Revital Bauer, Yehonathon Bauer, Binyamin Bauer, Daniel Bauer and Yehuda Bauer ("Plaintiffs"), by counsel, serve the Defendants the Palestinian Authority ("PA") and the Palestine Liberation Organization ("PLO") with the following interrogatories, which Defendants shall answer under oath and in writing within thirty days of the service of these interrogatories.

INSTRUCTIONS AND GENERAL DEFINITIONS

- 1. Defendants shall respond to these interrogatories as required by the Federal Rules of Civil Procedure and the Local Rules of this Court.
- 2. The full text of the definitions and rules of construction set forth in Local Civil Rule 26.3(c) and (d) is incorporated by reference herein and governs these interrogatories.

SPECIFIC DEFINITIONS

1. "PA" means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

- 2. "PLO" means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.
- 3. "Defendants" means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.
- 4. "Bombers" means and refers to Abdel Karim Ratab Yunis Aweis (who is mentioned in the First Amended Complaint in this action ("FAC") and was also the defendant in *Prosecutor v. Aweis*, File No. 3478/02), Nasser Jamal Mousa Shawish (who is mentioned in the FAC and was also the defendant in *Prosecutor v. Shawish*, File No. 3739/02), Sana'a Muhammed Shehadeh (who is mentioned in the FAC and was also the defendant in *Prosecutor v. Shehadeh*¹), Kaira Said Ali Sadi (who is mentioned in the FAC and was also the defendant in *Prosecutor v. Sadi*, File No. 3529/02) and Mohammed Hashaika (who is mentioned in the FAC and who died as a result of the March 21, 2002 bombing discussed in the FAC).

INTERROGATORIES

Interrogatory No. 1

Identify and describe in detail any and all positions and/or jobs held by the Bombers in the PA and/or the PLO and any and all work or employment performed by the Bombers for the PA and/or the PLO, at any time, including without limitation a detailed description, for all periods of time, of: (i) the titles, nature, purposes, responsibilities and duties of any and all such positions, jobs, work and/or employment; (ii) the ministries, agencies, divisions, bureaus, departments and/or instrumentalities of the PA and/or PLO in and/or for which the Bombers performed such positions, jobs, work and/or employment; (iii) the rank or ranks held by the

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¹ Plaintiffs do not know the case number in *Prosecutor v. Shehadeh*; however, Plaintiffs have provided Defendants with a copy of the indictment in that action, which contains Ms. Shehadeh's identification number and date of birth.

Bombers in all such positions, jobs, work and/or employment; (iv) the time periods during which the Bombers held and/or provided such positions, jobs, work and/or employment; (v) the amounts of the payments, salaries and/or other remunerations received by the Bombers for such positions, jobs, work and/or employment specifying the identity of the respective payor(s) of such amounts; and (vi) the names, titles and positions of all officials and/or employees of the PA and/or PLO to whom the Bombers were directly or indirectly subordinate in all such positions, jobs, work and/or employment and (vii) the current employment positions/titles and current employers of all persons named in response to subsection vi *supra*.

August 26, 2011

Plaintiffs, by their Attorney,

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CERTIFICATION

I hereby certify that on August 26, 2011, I served the within by electronic mail and United States mail on the counsel listed below.

Mark J. Rochon Richard A. Hibey Brian A. Hill MILLER & CHEVALIER CHARTERED 655 15th Street, NW, Suite 900 Washington D.C. 20005-6701